

Rhonda H. Wills  
Appearance Pro Hac Vice  
WILLS LAW FIRM, PLLC  
1776 Yorktown, Suite 570  
Houston, Texas 77056  
Telephone: (713) 528-4455  
Facsimile: (713) 528-2047  
rwills@rwillslawfirm.com

George P. Moschopoulos  
The Law Office of  
George Moschopoulos, APC  
34197 Pacific Coast Highway,  
Suite 100  
Dana Point, California 92629  
Telephone: (714) 904-1669  
Facsimile: (949) 272-0428  
georgem@logmapc.com

ATTORNEYS FOR PLAINTIFFS  
AND THE PUTATIVE CLASSES

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

RON HENRY, ET AL., on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

JPMORGAN CHASE & CO. and  
JPMORGAN CHASE BANK, N.A.,

Defendants.

Case No. 15-CV-03895-PSG-PLA

Hon. Philip S. Gutierrez

**DECLARATION OF RHONDA  
H. WILLS IN SUPPORT OF  
PLAINTIFF JOSE OMAR  
MARTINEZ'S EX PARTE  
APPLICATION FOR AN ORDER  
STRIKING DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR CONDITIONAL  
CERTIFICATION**

**DECLARATION OF RHONDA H. WILLS**

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the following is true and correct:

1. My name is Rhonda H. Wills. I am over the age of eighteen years, capable of making this declaration, and fully competent to testify to the matters stated here due to my position, experience, and personal knowledge. I have personal knowledge of the facts stated, and they are true.

2. I am counsel for Plaintiff Jose Omar Martinez in the above-referenced matter. I make this declaration in support of Plaintiff's *Ex Parte* Application for an Order Striking Defendants' Opposition to Plaintiff's Motion for Conditional Certification (Dkt. 98).

3. At 3:33 PM on Friday, September 16, 2016, my office contacted Defendants' counsel, notifying counsel for Defendants that we intended to file an *ex parte* application and identifying the substance of the proposed application. Defendants' counsel has indicated that Defendants are opposed to the filing of our *ex parte* application.

4. I checked the font size of Defendants' Opposition to Plaintiff's Motion for Conditional Certification. I printed Defendants' Opposition brief, making sure to set the "Page Scaling" option in Adobe Acrobat Pro to "none." I then measured

1 the length of the text on page one, line 24 of Defendants' brief. The text measures  
2 15.7 cm long.

3 5. I copied and pasted Defendants' brief into Microsoft Word and printed  
4 out the same text found on page one, line 24 of Defendants' brief with non-  
5 condensed 14-point Times New Roman font. The text measures 16.4 cm long.  
6

7 6. I then adjusted the same text in Microsoft Word, condensing the type  
8 face by 0.2 points, still using 14-point Times New Roman font. When the same text  
9 was condensed by 0.2 points, it again measured 15.7 cm long.  
10  
11

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct.

14 Executed on September 19, 2016

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16 By: /s Rhonda H. Wills  
17 Rhonda H. Wills  
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